

2019 DEC 11 PM 2:58

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DESHAWN MASSEY, JR., AKA RALPHIE
GIANNI, ET AL.,

Defendant.

) CASE NO.:

) 1 : 19 CR 761

) JUDGE GWIN

) MOTION TO SEAL INDICTMENT

Now comes the United States of America, by and through counsel, Justin E. Herdman, United States Attorney, and Margaret A. Kane, Assistant United States Attorney, and respectfully moves this Court for an order sealing the attached indictment for the following reason(s): To prevent the potential danger to the arresting officers, flight of the defendant, and the possible destruction of evidence if the defendant were to learn of the indictment prior to being arrested.

The government further requests this Court to order that an Assistant United States Attorney of the Criminal Division of the United States Attorney's Office for the Northern District of Ohio may obtain, upon request, a certified copy of this indictment should the defendant be located in another judicial district and a certified copy of this indictment is needed

for forwarding to that judicial district. See Rule 6(e)(4) of the Federal Rules of Criminal Procedure.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney

By:


Margaret Kane (OH: 0082084)
Assistant United States Attorney
United States Court House
801 West Superior Avenue, Suite 400
Cleveland, OH 44113
(216) 622-3624
(216) 522-7358 (facsimile)
Margaret.Kane@usdoj.gov